



U.S. Department of Justice

Criminal Division

Fraud Section

October 2, 2024

VIA EMAIL & FILE SHARE

Tyrone J. Paylor
First Assistant Federal Public Defender
One Memphis Place
Memphis, TN 38103
Tyrone_paylor@fd.org

Re: *United States v. Lisa Jeanine Findley, No. 2:24-cr-20145-JTF (W.D. Tenn.)*
Government's Second Production of Information

Dear Mr. Paylor:

In response to your request for discovery filed on September 24, 2024 (ECF No. 32), please be advised that copies of the information described in the accompanying index have been sent to you via file share along with this accompanying letter. This is the government's second production of information. The information being produced to you in connection with this letter will be contained in a zip file labeled "U.S. v. Findley – Government Production #2." The Bates range for this production is DOJ-PROD-0000049378 – DOJ-PROD-0000049429.

In addition to the five digital devices described in the letter accompanying the government's first production of information, the government seized other items pursuant to a search warrant executed at the defendant's residence (the "Additional Items Seized"). Included in this production is an inventory of all of the items seized from the defendant's residence pursuant to a search warrant. Also included in this production are photographs of the Additional Items Seized. The government will make the Additional Items Seized available for inspection upon request. Please be advised that certain of the Additional Items Seized are will be analyzed by federal law enforcement, namely the shredded paper, the SIM card, the "all in one computer", and the smart watch, which are reflected in the inventory and photographs.

* * *

In this production, the government may have provided information and material that exceeds the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law. Any non-discoverable information and material provided has been voluntarily and solely as a matter of discretion.

The fact that certain non-discoverable information and material may be provided in no way obligates the government to provide all non-discoverable information and material, and the fact that certain non-discoverable information and material has been provided should not be taken as a

representation as to the existence or non-existence of any other non-discoverable information and material.

By opening this production, you agree that the produced information and material is sensitive and confidential, will be used only for purposes of the above-captioned case, and shall not be publicly disclosed in any way unless pre-authorized by the government or the Court.

* * *

If you have any questions, please contact us and AUSA André at your convenience.

Sincerely,

/s/ Aaron Henricks

Aaron Henricks
Trial Attorney

Christopher Fenton
Trial Attorney

Cory E. Jacobs
Assistant Chief

United States Department of Justice
Criminal Division, Fraud Section

Enclosures:

- One File Share Link via Email
- Government Production #2 Index

Cc: AUSA Carroll L. André, III
Clerk, U.S. District Court (w/o enclosures)